

REPLY COMMENTS of George Simmons  
Retired Engineer

In looking over the hundreds of comments sent in on the issue of AM stations using translators I would like to take this opportunity to look at the issue as a practical matter.

I am in support of the proposal but must ask how the Commission intends to implement changes so that relief can really be achieved?

In many urbanized areas translators exist that can be used for AM station operation. It is just a matter of the stations being able to work out the proper deal with the owners of the translators once the Commission gives its blessing. Not all stations will be able to afford or go this route due to congestion but that is a marketing problem and all resources are finite in the end.

My question is how we get relief for stations that are now operating in areas that have;

- A. No existing translators of any kind, so no way to purchase or broker.
- B. No existing CP's to purchase
- C. No translator applications on file.

There are parts of the nation that are NOT covered by existing or applied for translators and some of these areas are not as remote as you might think. There is not enough clear spectrum for a full power station but there is enough to allow new translators to be put in, but nothing was ever applied for, or any CP's issued have been revoked or now expired.

The Commission must address this in the instant NPRM. In areas where no translator exists and an AM station is in operation that needs a translator, the Commission should allow a limited application window. Or, as some have mentioned, the Commission should explore the possibility of assigning a frequency to stations now in areas where NO translator assignments now exist. Many of the commenters have stated they are the only AM station in their county. If no translator applications are on file and no CP's exist that could be used inside the 2 mv contour of the AM station then real relief cannot be accomplished.

The Commission has stated that it will limit the number of applications to be processed to no more than ten per applicant for the current crop of requests now pending. This will of course free up thousands of applications that were put in by the two religious operations that generated so many of the great translator invasion requests. But in areas where not even those organizations are holding applications or CP's, the Commission must act to provide those AM stations in such areas a chance to make an application if the spectrum allows. As an example, a station I once worked at is a prime candidate for the above situation. WGTO is a 1 kilowatt daytimer in Cass County Michigan. Cass County is in southwestern Michigan. The county has not a single translator operating or even applied for in the non reserved FM band. One CP did exist but was revoked when the holder, Horizon Christian Fellowship failed to construct and apply for a License to Cover in accordance with the rules, so the Commission canceled the CP.

In a situation such as this the Commission should allow WGTO to apply for the facilities that were specified in the now revoked CP. If WGTO and other stations in similar situations are forced to wait for the next nationwide window to apply for a translator in their area it could be several years, if not a decade away. The Commission in its own NPRM noted the urgency of the situation.

In the case of WGTO and stations in similar circumstances, there would be no competing applications to deal with. For instance in Cass County only two AM stations exist. They are under common ownership so no MX situation would exist if a window is opened for AM stations only in areas where no translator facilities now exist, and in fact any new translators would be in effect "first service."

In areas where applications will be vacated, local AM stations should have the right to apply for those facilities if they can be used in accordance with the proposed rules. Tower location and frequency have already been determined and lease arrangements for space and power in most cases were already worked out with the original applicant.

Many of the applications that are set to be vacated were for facilities that were marginal at best in that the proposed station to be retransmitted may or may not have been receivable at the translator location. This would not be a problem for the local AM station that would feed the translator by direct means.

The Commission must keep in mind that true relief will depend on how many stations are helped. The great majority of stations submitting comments were

typical “mom pop” or heritage stations that have never made a lot of money but have, and continue to provide the LOCAL programming that is of so much concern now. These stations can probably afford (or finance) the equipment for translators but in no way could they compete for an assignment in an open auction with some high powered AM in the next county. In areas where a new translator would indeed be first service, the local AM station should be able to apply and obtain it.

When the FM service was first set up many years ago, the local AM station was allowed a preference in applying for an FM CP based on the table of allotments. This is what lead to so many AM FM combos in the first place.

This needs to be done once again for AM stations in areas with NO translators If the spectrum allows it, “new service” translators should go to local AM stations with only a simple application and no MX possibility.

Respectfully submitted

George Simmons